

Received & Inspected

FEB 28 2012

FCC Mail Room

February 21, 2012

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street SW,  
Suite TW-A325  
Washington, DC 20554

RE: EB Docket No. 06-36

Ms. Dortch,

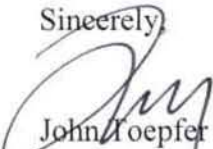
Please find enclosed the Annual 47 C.F.R. s 64.2009(e) CPNI Certification Template for EB Docket 06-36 filled out and attached with an accompanying statement explaining CPNI procedures. I have included five total originally signed copies of this required filing and trust I am in compliance with the demand to file for this calendar year.

Should you have any questions or requirements that I might have inadvertently overlooked or need the format in a slightly different form, please do not hesitate to contact me in any of the following manners

Email: [John@tcomconsultants.net](mailto:John@tcomconsultants.net)  
Office: 559-436-8266  
Mobile: 559-392-4343  
Mail: Telecom Consultants, Inc.  
Attn: John Toepfer  
433 E. Keats Avenue  
Suite 6  
Fresno, CA 93710

Thank you for your help.

Sincerely,



John Toepfer  
President, Telecom Consultants, Inc.

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ATTACHMENT 2

**Annual 47 C.F.R. § 64.2009(e) CPNI Certification Template****EB Docket 06-36**

Annual 64.2009(e) CPNI Certification for 2012 covering the prior calendar year 2011

1. Date filed: February 21, 2012
2. Name of company(s) covered by this certification: Telecom Consultants, Inc.
3. Form 499 Filer ID: 824338
4. Name of signatory: John Toepfer
5. Title of signatory: President
6. Certification:

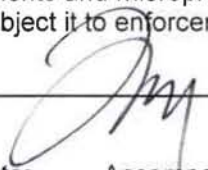
I, John Toepfer, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. See 47 C.F.R. § 64.2001 *et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements (including those mandating the adoption of CPNI procedures, training, recordkeeping, and supervisory review) set forth in section 64.2001 *et seq.* of the Commission's rules.

The company **has not** taken actions (*i.e.*, proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year. [NOTE: If you reply in the affirmative, provide an explanation of any actions taken against data brokers.]

The company **has not** received customer complaints in the past year concerning the unauthorized release of CPNI [NOTE: If you reply in the affirmative, provide a summary of such complaints. This summary must include the number of complaints, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information.]

The company represents and warrants that the above certification is consistent with 47 C.F.R. § 1.17 which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed  [Signature of an officer, as agent of the carrier]

**Attachments:**      Accompanying Statement explaining CPNI procedures  
                                 Explanation of actions taken against data brokers (if applicable)  
                                 Summary of customer complaints (if applicable)

## Statement of CPNI Operating Procedure.

Telecom Consultants, Inc. (TCI) has only a handful of remaining customers in a services management relationship. We DO NOT, under any circumstances, conduct marketing campaigns, or on-going marketing efforts, which need access to CPNI details in any way. We no longer have any sales staff or contracted personnel in agency relationships.

(a) All Customers of TCI are personally known to the personnel of TCI and we will only discuss issues with end-users at their request. In the event a representative for the end-user calls and needs information or desires to make changes to the account, we verify the identity of the calling party and determine whether that individual has authority on file to handle the matters of the end-user's account. If the calling individual has no known authority, TCI verifies their authority with the known contact on file before continuing.


(b) Each year TCI reminds employees that use of CPNI is forbidden under all circumstances with the exception of the authorized individuals on file for each end-user. Breach of this requirement of maintaining secure records will result in a warning and, upon a second breach a discontinuance of employment for the employee in violation.

(c) Since we do not participate in any marketing campaigns with or toward our customers and/or vendors, we do not have the concerns of violating CPNI disclosure rules. However, with each calendar year's filing of the CPNI certificate, we maintain a record of details needed to maintain compliance and which are to be closely guarded. TCI conducts an annual employee meeting stressing the requirements to keep the CPNI closely guarded. As stated above, breach of this requirement of maintaining secure records will result in a first warning and, upon a second breach a discontinuance of employment by any employee.

(d) Again, we have no sales staff and no joint marketing efforts with Vendors or internally that would require use of CPNI. Our review process is to conduct the annual filing of the certification and determine that current systems are sufficient to ensure continued compliance.

I, John Toepfer, certify that I am an officer of Telecom Consultants, Inc., and acting as an agent of the company, I can verify that Telecom Consultants, Inc. is now and will continue to remain in compliance with the Commission's CPNI Rules.

Respectfully signed,



John Toepfer